

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America )

v. )

DAVID FORTE )  
JOHN YOUNIS, and )  
GREGORY MANNING )

Case No. 1:22-mj-06014-MPK

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2016 - August 2016 in the county of Norfolk in the  
District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. § 371

Offense Description

Conspiracy to commit securities fraud

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Jenny Shelton.

☒ Continued on the attached sheet.

/s/ Jenny Shelton

Complainant's signature

Jenny Shelton, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

January 18, 2022

Date: \_\_\_\_\_

City and state: Boston, MassachusettsPage Kelley  
Judge's signature

Hon. M. Page Kelley, U.S. Magistrate Judge

Printed name and title